

MIOSHA

General Industry Safety and Health Division (GISHD)
Michigan Occupational Safety and Health Administration (MIOSHA)
Department of Labor and Economic Opportunity (LEO)

DIVISION INSTRUCTION

DOCUMENT IDENTIFIER:

GISHD-COM-16-2R2

DATE:

June 28, 2021

SUBJECT: Process Safety Management (PSM) National Emphasis Program (NEP)

- I. Purpose. This instruction establishes agency enforcement policies and provides instruction to ensure compliance with the federal Occupational Safety and Health Administration (OSHA) NEP PSM.
- II. Scope. This instruction applies to PSM/Chemical (PSM/CHEM NEP) compliance inspections conducted by the GISHD.
- III. References.
 - A. General Industry Safety Standards Part 91. /R408.19101 et seq., [Process Safety Management of Highly Hazardous Chemicals](#).
 - B. [MIOSHA Field Operations Manual \(FOM\)](#), as amended.
 - C. Occupational Health Standards Part 591. /R325.18301 et seq., [Process Safety Management of Highly Hazardous Chemicals](#).
 - D. OSHA Instruction CPL 03-00-021, January 17, 2017, [PSM Covered Chemical Facilities National Emphasis Program](#).
 - E. OSHA Memorandum, May 11, 2016, [RAGAGEP in Process Safety Management Enforcement](#).
 - F. OSHA Memorandum, July 18, 2016, [PSM of Highly Hazardous Chemicals and Covered Concentrations of Listed Appendix A Chemicals](#).
 - G. OSHA Memorandum, April 30, 2018, on [Process Safety Management Retail Exemption Enforcement Policy](#).
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.
- V. Cancellations. This instruction cancels all previous versions of this instruction.
- VI. Next Review Date. This instruction will be reviewed in five years from date of issuance.
- VII. History. History of previous versions includes:

GISHD-COM-16-2R1, March 15, 2018
GISHD-COM-16-2, November 2, 2016
GISHD-MEMO-COM-10-3R1, January 24, 2012
GISHD-MEMO-COM-10-3, October 6, 2010
- VIII. Contact. [Gerry Dike](#), Industrial Hygienist Specialist, GISHD.
- IX. Originator: Adrian Z. Rocskay, Division Director.

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- X. Significant Change. Added reference to OSHA memorandum of April 30, 2018 on Process Safety Management Retail Exemption Enforcement Policy.
- XI. Background. The purpose of the OSHA PSM NEP is to inspect facilities with highly hazardous chemicals in amounts at or greater than the listed threshold quantities and to verify employer compliance with the PSM regulations, which are General Industry Safety Standard [Part 91](#) and Occupational Health Standard [Part 591](#).
- XII. Action.
 - A. MIOSHA will use the program procedures in OSHA Instruction CPL 03-00-021, [PSM Covered Chemical Facilities NEP](#). The procedures in the OSHA PSM instruction modify the inspection procedures in Chapter V of the [MIOSHA FOM](#).
 - B. MIOSHA will follow the OSHA PSM [memorandum](#) on Recognized and Generally Accepted Good Engineering Practices (RAGAGEP) form.
 - C. MIOSHA will follow the OSHA July 18, 2016, [memorandum](#) on Covered Concentrations of Listed Appendix A Chemicals under the PSM Standard.
 - D. MIOSHA will follow the OSHA April 30, 2018 memorandum on [Process Safety Management Retail Exemption Enforcement Policy](#).